

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

BRIDGET NAMONDO MBOME,

Plaintiff,

v.

HENRY NJIE, EMILIA NJIE, and MARY
MBELLA,

Defendants.

CIVIL ACTION NO. 4:18-cv-00597-P

PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Plaintiff Bridget Namondo Mbome files her Motion for Partial Summary Judgment and states as follows:

I. SUMMARY

Ms. Mbome hereby respectfully moves the Court to enter partial summary judgment on five of the eleven claims alleged in her Complaint (ECF No. 1).

First, Ms. Mbome seeks partial summary judgment as to Defendants' liability on Count One – Violation of the Trafficking Victims Protection Reauthorization Act ("TVPRA"), Forced Labor. Ms. Mbome seeks partial summary judgment on this claim on the grounds that there is no genuine issue of material fact with respect to Defendants' liability. Ms. Mbome will present evidence on damages relevant to this claim at trial.

Second, Ms. Mbome seeks partial summary judgment as to Defendants' liability on Count Two – Violation of the TVPRA, Trafficking. Ms. Mbome seeks partial summary judgment on this claim on the grounds that there is no genuine issue of material fact with respect to Defendants' liability. Ms. Mbome will present evidence on damages relevant to this claim at trial.

Third, Ms. Mbome seeks partial summary judgment as to Defendants' liability on Count Four – Violation of the TVPRA, Conspiracy. Ms. Mbome seeks partial summary judgment on this claim on the grounds that there is no genuine issue of material fact with respect to Defendants' liability. Ms. Mbome will present evidence on damages relevant to this claim at trial.

Fourth, Ms. Mbome seeks partial summary judgment as to Count Six – Fair Labor Standards Act ("FLSA"), Failure to Pay Wages. Specifically, Ms. Mbome seeks a finding that Ms. Mbome was an employee of Defendants Emilia and Henry Njie for purposes of the minimum wage requirements under the FLSA. Ms. Mbome will present further evidence in support of this claim at trial.

Fifth, Ms. Mbome seeks partial summary judgment as to Defendants' liability on Count Eleven – Quantum Meruit. Ms. Mbome seeks partial summary judgment on this claim on the grounds that there is no genuine issue of material fact with respect to Defendants' liability. Ms. Mbome will present evidence on damages relevant to this claim at trial.

In accordance with N.D. Tex. L.R. 56.3(b), Ms. Mbome fully discusses the elements of each claim for which she seeks summary judgment in the brief accompanying this motion.

Dated: February 3, 2020

Respectfully submitted,

By: /s/ Matthew V. Lloyd

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of February, 2020, I served all Parties of record in accordance with the Federal Rules of Civil Procedure 5(b)(2).

/s/ Matthew V. Lloyd

Matthew V. Lloyd